

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff,

Plaintiff,

v.

FAIRFIELD PAGMA ASSOCIATES, LP, a New York  
limited partnership, SEYMOUR KLEINMAN,  
ESTATE OF MARJORIE KLEINMAN A/K/A  
MARJORIE HELENE KLEINMAN, BONNIE JOYCE  
KANSLER, as executor, FAIRFOX, LLC, a New York  
limited liability company, and SEYFAIR, LLC, a New  
York limited liability company,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05169 (CGM)

**STIPULATION AND ORDER TO ADJOURN DEADLINES *SINE DIE***

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the substantively consolidated chapter 7 estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Fairfield Pagma Associates, LP, a New York limited partnership, Seymour Kleinman, Estate Of Marjorie Kleinman a/k/a Marjorie Helene Kleinman, Bonnie Joyce Kansler, as executor, Fairfax, LLC, a New York limited liability company, and Seyfair, LLC, a New York limited liability company (collectively, the “Defendants”) by and through their counsel, Lax & Neville LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

**WHEREAS**, on November 17, 2021, the Trustee filed his motion for summary judgment (the “Motion”) in the above-referenced adversary proceeding, ECF Nos. 94–99, 127;

**WHEREAS**, on April 13, 2022, this Court granted the Trustee’s Motion, ECF No. 137, and entered judgment against Defendants in favor of the Trustee, ECF No. 144;

**WHEREAS**, on May 4, 2022, Defendants Seymour Kleinman and Bonnie Joyce Kansler, as executor of the estate of Marjorie Kleinman, filed their Notice of Appeal to the District Court, ECF No. 145;

**WHEREAS**, on November 7, 2022, the District Court vacated this Court’s judgment against Defendants Seymour Kleinman and Bonnie Joyce Kansler, as executor of the estate of Marjorie Kleinman, and remanded to this Court for further proceedings, *Kansler v. Picard (In re BLMIS)*, No. 22-CV-3914, 2022 WL 16751911 (S.D.N.Y. Nov. 7, 2022);

**WHEREAS**, on November 14, 2022, the Parties reached a settlement in principle and agreed to request that all pending deadlines be adjourned *sine die* to allow the Parties to complete the settlement.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the Parties, and **SO ORDERED**, by the Court, that:

1. All pending deadlines are adjourned *sine die*.

Dated: November 17, 2022  
New York, New York

*/s/ Nicholas J. Cremona*  
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Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter  
7 Estate of Bernard L. Madoff*

*Attorney for Defendants*

**Dated: November 18, 2022**  
**Poughkeepsie, New York**



*/s/ Cecelia G. Morris*

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**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**